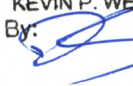


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NORTHERN DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

FEB 07 2025

KEVIN P. WEIMER, Clerk
By:  Deputy Clerk

MUTWAKIL ELHAG

(Print your full name)

Plaintiff *pro se*,

v.

DELTA AIR LINES, INC., Including all its

affiliaes, subsidiaries, and codeshare or

partner airlines, et.al.

(Print full name of each defendant; an
employer is usually the defendant)

Defendant(s).

CIVIL ACTION FILE NO.

1:25-CV-0606

(to be assigned by Clerk)

PRO SE EMPLOYMENT DISCRIMINATION COMPLAINT FORM

Claims and Jurisdiction

1. This employment discrimination lawsuit is brought under (check only those that apply):

X

Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., for employment discrimination on the basis of race, color, religion, sex, or national origin, or retaliation for exercising rights under this statute.

NOTE: To sue under Title VII, you generally must have received a notice of right-to-sue letter from the Equal Employment Opportunity Commission ("EEOC").

X Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 et seq., for employment discrimination against persons age 40 and over, or retaliation for exercising rights under this statute.

NOTE: To sue under the Age Discrimination in Employment Act, you generally must first file a charge of discrimination with the EEOC.

 Americans With Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq., for employment discrimination on the basis of disability, or retaliation for exercising rights under this statute.

NOTE: To sue under the Americans With Disabilities Act, you generally must have received a notice of right-to-sue letter from the EEOC.

 Other (describe) _____

2. This Court has subject matter jurisdiction over this case under the above-listed statutes and under 28 U.S.C. §§ 1331 and 1343.

Parties

3. Plaintiff. Print your full name and mailing address below:

Name MUTWAKIL ELHAG

Address 650 North Pointe Knoll Ct.

RIVERDALE, GA 30274

4. Defendant(s). Print below the name and address of each defendant listed on page 1 of this form:

Name DELTA AIR LINES, INC., ET.AL.

Address ATTN: CORPORATION SERVICE COMPANY

2 SUN COURT, STE. 400, PEACHTREE CORNER, GA 30092

Name DELTA AIR LINES, INC., ET.AL.

Address 16000 N Terminal Pkwy Suite 4000

ATLANTA, GA 30320

Name _____

Address _____

Location and Time

5. If the alleged discriminatory conduct occurred at a location different from the address provided for defendant(s), state where that discrimination occurred:

HARTSFIELD-JACKSON ATLATNA INTERNATIONAL AIRPORT

6000 N TERMINAL PKWY, SUITE 4000, ATLANTA, GA 30320

6. When did the alleged discrimination occur? (State date or time period)

MARCH 6, 2024

Administrative Procedures

7. Did you file a charge of discrimination against defendant(s) with the EEOC or any other federal agency? X Yes _____ No

If you checked "Yes," attach a copy of the charge to this complaint.

8. Have you received a Notice of Right-to-Sue letter from the EEOC?

X Yes _____ No

If you checked "Yes," attach a copy of that letter to this complaint and state the date on which you received that letter:

Approx. 11/8/24 dated 11/6/2024

9. If you are suing for **age discrimination**, check one of the following:

X 60 days or more have elapsed since I filed my charge of age discrimination with the EEOC

_____ Less than 60 days have passed since I filed my charge of age discrimination with the EEOC

10. If you were employed by an agency of the State of Georgia or unsuccessfully sought employment with a State agency, did you file a complaint against defendant(s) with the Georgia Commission on Equal Opportunity?

☐ Yes ☐ No ☒ Not applicable, because I was not an employee of, or applicant with, a State agency.

If you checked "Yes," attach a copy of the complaint you filed with the Georgia Commission on Equal Opportunity and describe below what happened with it (i.e., the complaint was dismissed, there was a hearing before a special master, or there was an appeal to Superior Court):

11. If you were employed by a Federal agency or unsuccessfully sought employment with a Federal agency, did you complete the administrative process established by that agency for persons alleging denial of equal employment opportunity?

☐ Yes ☐ No ☒ Not applicable, because I was not an employee of, or applicant with, a Federal agency.

If you checked "Yes," describe below what happened in that administrative process:

Nature of the Case

12. The conduct complained about in this lawsuit involves (check only those that apply):

☐ failure to hire me
☐ failure to promote me
☐ demotion
☐ reduction in my wages
☐ working under terms and conditions of employment that differed from similarly situated employees
☐ harassment
☐ retaliation
☒ termination of my employment
☐ failure to accommodate my disability
☐ other (please specify) _____

13. I believe that I was discriminated against because of (check only those that apply):

☒ my race or color, which is BLACK
☒ my religion, which is MUSLIM
☐ my sex (gender), which is ☒ male ☐ female
☒ my national origin, which is SUDANESE
☒ my age (my date of birth is 01/01/1972)
☐ my disability or perceived disability, which is: _____

☐ my opposition to a practice of my employer that I believe violated the federal anti-discrimination laws or my participation in an EEOC investigation

☒ other (please specify) DISCRIMINATION DUE TO MY ETHNICITY

14. Write below, as clearly as possible, the essential facts of your claim(s). Describe specifically the conduct that you believe was discriminatory or retaliatory and how each defendant was involved. Include any facts which show that the actions you are complaining about were discriminatory or retaliatory. Take time to organize your statements; you may use numbered paragraphs if you find that helpful. Do not make legal arguments or cite cases or statutes.

PLEASE SEE ATTACHED STATEMENT OF CLAIM.

(Attach no more than five additional sheets if necessary; type or write legibly only on one side of a page.)

15. Plaintiff X still works for defendant(s)
no longer works for defendant(s) or was not hired
16. If this is a disability-related claim, did defendant(s) deny a request for reasonable accommodation? Yes No

If you checked "Yes," please explain: N/A

17. If your case goes to trial, it will be heard by a judge unless you elect a jury trial. Do you request a jury trial? _____ Yes _____ No

Request for Relief

As relief from the allegations of discrimination and/or retaliation stated above, plaintiff prays that the Court grant the following relief (check any that apply):

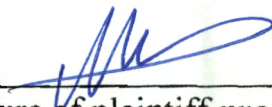
- X Defendant(s) be directed to REINSTATE FORMER POSITION,
REINBURSE BACK PAY AND LOST BENEFITS WITH INTEREST, ETC.
- Money damages (list amounts) _____

- X Costs and fees involved in litigating this case
- X Such other relief as may be appropriate

PLEASE READ BEFORE SIGNING THIS COMPLAINT

Before you sign this Complaint and file it with the Clerk, please review Rule 11 of the Federal Rules of Civil Procedure for a full description of your obligation of good faith in filing this Complaint and any motion or pleading in this Court, as well as the sanctions that may be imposed by the Court when a litigant (whether plaintiff or defendant) violates the provisions of Rule 11. These sanctions may include an order directing you to pay part or all of the reasonable attorney's fees and other expenses incurred by the defendant(s). Finally, if the defendant(s) is the prevailing party in this lawsuit, costs (other than attorney's fees) may be imposed upon you under Federal Rule of Civil Procedure 54(d)(1).

Signed, this 7 day of February, 2025


(Signature of plaintiff *pro se*)

MUTWAKIL ELHAG
(Printed name of plaintiff *pro se*)

650 North Pointe Knoll CT
(street address)

Riverdale GA 30274
(City, State, and zip code)

MUTWAKIL Elhag @ yahoo-com
(email address)

+1 404-246-4430
(telephone number)

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Georgia ☒

MUTWAKIL ELHAG

Plaintiff(s)

v.

DELTA AIR LINES, INC., Including all Its Affiliates,
Subsidiaries, and Coshares or Partner Airlines., et.al.,

Defendant(s)

Civil Action No.

1:25-CV-0606

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* DELTA AIR LINES, INC., et.al.
ATTN: CORPORATION SERVICE COMPANY
2 SUN COURT, STE. 400
PEACHTREE CORNER, GA 30092

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

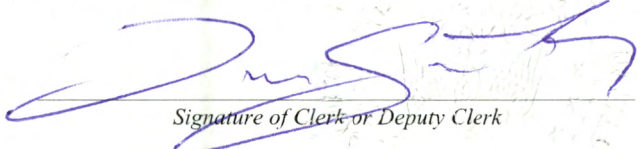
MUTWAKIL ELHAG
650 NORTH POINTE KNOLL COURT
RIVERDALE, GA 30274

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

2/7/2025


Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: